

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

As representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors

PROMESA
Title III

No. 17 BK 3283-LTS

REQUEST FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW creditor MCCANN ERICKSON CORPORATION, SA ("McCann") represented by the undersigned attorney and respectfully sets forth and prays:

1. On May 19, 2022, the Debtor filed a "Notice of Presentment of Proposed Order Granting the Three hundred Ninetieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to No Liability Claims (ECF No. 17973)". *See* Docket 20876.

2. Among the objected claims, claims 53762 and 59767 relate to services rendered by McCann to Debtor, and substantial amounts of both claims are hereby objected on the grounds of partial payments and for lack of a valid contract. *See* Docket 20876.

3. During this Title III process, the McCann local branch was purchased by a local corporation. Therefore, McCann requests an extension of thirty (30) days to revise its accountancy books and corroborate the information related to the objections to the aforementioned claims.

WHEREFORE, McCann requests an extension of 30 days to object to the proposed of the proposed Order at docket 20876, at least to the extent to claims 53762 and 59767.

NOTICE

Notice of this motion has been provided in accordance with the Case Management Procedures through CM/ECF system which will send notice electronically to all counsels of record. A hard copy has also been sent by mail to the attorneys for the Financial Board for Puerto Rico, as representative of the Commonwealth of Puerto Rico. A copy of the motion is also available on the Commonwealth's case website at <https://cases.primeclerk.com/puertorico/>.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 27th day of May, 2022.

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